

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA	)	Crim. No. 20-300 <u>33</u> -MGM
	)	
v.	)	Violations:
	)	
(1) ANTONIO STRONG, also known as	)	<u>Count One:</u> Conspiracy to Commit Wire Fraud
"T-Glo," "Tony Glo," "Tonio," "Antonio	)	(18 U.S.C. § 1349)
Strom," "Michael Starkman," "Richard	)	
O'Malley," "Michael Lee," "Mark Daniels,"	)	<u>Counts Two through Five:</u> Wire Fraud
"Sergio Parker," "Michael Leary," "Charles	)	(18 U.S.C. § 1343)
Gaut," "Darren Geiger," "Stan Smith," and	)	
"Tyson Kocher,"	)	
	)	<u>Count Six through Fourteen:</u> Aggravated
(2) HERBERT WRIGHT III, also known	)	Identity Theft; Aiding and Abetting
as "Herb," "Lil Herb," "G Herbo," and	)	(18 U.S.C. §§ 1028A and 2)
"Herbert Light,"	)	
	)	<u>Forfeiture Allegation:</u>
(3) JOSEPH WILLIAMS, also known as	)	(18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. §
"Joe Rodeo," Rockstar Rodie," and "Rodie,"	)	2461)
	)	
(4) STEVEN HAYES, JR.,	)	
	)	
(5) DEMARIO SORRELLS, also known	)	
as "Jonte" and "Johntay," and	)	
	)	
(6) TERRENCE BENDER, also known as	)	
"Blends" and "Dopeblends,"	)	
	)	
Defendants.	)	
	)	

INDICTMENT

At all times relevant to this Indictment:

General Allegations

The Defendants

1. Defendant ANTONIO STRONG ("STRONG"), also known as "T-Glo," "Tony Glo," "Tonio," "Antonio Strom," "Michael Starkman," "Richard O'Malley," "Michael Lee," "Mark Daniels," "Sergio Parker," "Michael Leary," "Charles Gaut," "Darren Geiger," "Stan Smith," and "Tyson Kocher," was a resident of the Chicago, Illinois area. STRONG presented himself as a promoter and manager of rappers, particularly those in the Chicago area.

2. Defendant HERBERT WRIGHT III ("WRIGHT"), also known as "Herb," "Lil Herb," "G Herbo," and "Herbert Light," was a resident of the Chicago area and a rapper.

3. Defendant JOSEPH WILLIAMS ("WILLIAMS"), also known as "Joe Rodeo," "Rockstar Rodie," and "Rodie," was a resident of the Chicago area and a rapper.

4. Defendant STEVEN HAYES, JR. ("HAYES") was a resident of the Chicago area.

5. Defendant DEMARIO SORRELLS ("SORRELLS"), also known as "Jonte" and "Johntay," was a resident of the Chicago area.

6. Defendant TERRENCE BENDER ("BENDER"), also known as "Blends" and "Dopeblends," was a resident of the Chicago area.

Associated Individuals

7. Individual 1 was a resident of the Chicago area, a sibling of STRONG, and the fiancée of SORRELLS.

8. Individual 2 was the girlfriend of WILLIAMS.

9. Individual 3 was a resident of the Chicago area and an associate of Individual 1.

10. Individual 4 was a resident of the Chicago area and a rap-music cinematographer.
11. Individual 5 was a resident of the Chicago area and a rapper.
12. Individual 6 was a resident of the Chicago area and a friend of STRONG.

Victim Businesses

13. The businesses victimized by the defendants include the following:
  - a. Private Jet Company 1 was a private jet-charter company based in Illinois.
  - b. Private Jet Company 2 was a private jet-charter company based in Massachusetts.
  - c. Private Jet Company 3 was a private jet-charter company based in Louisiana.
  - d. Private Jet Company 4 was a private jet-charter company based in California.
    - a. Vacation Rental Company 1 was a luxury-accommodations company based in Massachusetts.
    - b. Vacation Rental Company 2 was a property-rental company based in Nevada.
    - c. Limousine Rental Company was a limousine company in based in Michigan.
    - d. Pet Company was a luxury pet shop based in Michigan.
    - e. Hotel 1 and Hotel 2 were companies that operated hotels in Massachusetts.

The Conspiracy and the Scheme to Defraud

14. From in or around March 2016 until the present, the defendants STRONG, WRIGHT, WILLIAMS, HAYES, SORRELLS, and BENDER (collectively, the “defendants”) conspired with each other and other co-conspirators known and unknown to the Grand Jury (the “co-conspirators”) to defraud numerous businesses and individuals throughout the United States by possessing, using, and transferring unauthorized and stolen payment card account information (the “illicit account information”) to obtain valuable goods and services.

15. The goods and services included private jet charters, private yacht charters, exotic car rentals, luxury hotel and vacation rental accommodations, private chef and security guard services, designer puppies, limousine and chauffeur services, commercial airline flights, consumer goods, and meals and other incidentals.

16. The illicit account information included the actual cardholders’ names, addresses, payment card account numbers, security codes, and account expiration dates.

17. Generally, because the defendants and their co-conspirators provided authentic payment card information, the defrauded businesses and individuals successfully processed their transactions and provided the goods and services.

18. Generally, the actual cardholders discovered these transactions on their accounts and disputed the charges. The actual cardholders’ payment card companies then reversed their payments and charged back the transactions to the businesses and individuals, which consequently suffered losses in the amounts of the unauthorized transactions.



Purposes of the Conspiracy and the Scheme to Defraud

19. The principal purposes of the conspiracy and the scheme to defraud included the following:

- a. to obtain the illicit account information;
- b. to transfer and share the illicit account information among themselves and others;
- c. to use the illicit account information to obtain goods and services for the benefit of the defendants and others;
- d. to disguise their actual identities from the defrauded businesses and individuals in order for the conspiracy to avoid detection from law enforcement; and
- e. to provide false statements to law enforcement in order for the conspiracy to avoid detection.

Manner and Means of the Conspiracy and the Scheme to Defraud

20. Among the manner and means by which the defendants and their co-conspirators carried out the conspiracy and the scheme to defraud were the following:

- a. obtaining the illicit account information (which they called “cards,” “moves,” or “joints”) from dark web sites and from co-conspirators;
- b. transferring the illicit account information to each other through text messages, social media messages, e-mails, and oral telephone conversations;
- c. presenting the illicit account information to defrauded businesses and individuals through online bookings, text messages, social media messages, e-mails, and oral

telephone conversations;

d. using aliases, the names of actual cardholders or real persons, and false or unauthorized state identifications and driver's licenses, in their communications with businesses and individuals;

e. executing contracts and payment card authorization forms using aliases and the names of actual cardholders or other real persons; and

f. using e-mail accounts in the names of aliases, real businesses, and fictitious entities.

21. As further part of the conspiracy and the scheme to defraud, the defendants and co-conspirators undertook the following:

The Private Jet Company 1 Fraud

a. On or about March 3, 2017, STRONG used the alias "Richard O'Malley" and illicit account information to make a fraudulent and unauthorized payment for a charter with Private Jet Company 1 from Chicago to Teterboro, New Jersey for two women. That day, the two women flew on the charter from Chicago to Teterboro.

b. On or about March 4, 2017, STRONG used the alias "Richard O'Malley" and illicit account information to make a fraudulent and unauthorized payment for a charter with Private Jet Company 1 from Chicago to Fort Lauderdale, Florida for STRONG (falsely named in the passenger list using the name of Individual 4), WILLIAMS, SORRELLS, Individual 1, Individual 3, Individual 6, and others. That day, these individuals flew on the charter from Chicago to Fort Lauderdale.

c. On or about March 6, 2017, a co-conspirator asked Private Jet Company 1 to pay for car rentals by SORRELLS and Individual 1 at Enterprise Rent-A-Car in Florida by using illicit account information. That day, SORRELLS and Individual 1 rented a Bentley CGTC and a Maybach S600 from Enterprise Rent-A-Car using the illicit account information.

d. On or about March 9, 2017, STRONG used the alias “Richard O’Malley” and illicit account information to make a fraudulent and unauthorized payment for another charter with Private Jet Company 1 from Chicago to Miami, Florida for WRIGHT (falsely named in the passenger list as “Herbert Light”) and eight other individuals. That day, these individuals flew on the charter from Chicago to Miami.

The Private Jet Company 2 Fraud

e. On or about March 14, 2017, STRONG used the name of Individual 4 and illicit account information, purportedly in the name of “Epic Music,” to make a fraudulent and unauthorized payment for a charter with Private Jet Company 2 from Miami to Chicago for STRONG (falsely named in the passenger list under the name of Individual 4), Individual 6, and two women. On or about March 15, 2017, these individuals flew on the charter from Miami to Chicago.

f. On or about March 16, 2017, STRONG used the name of Individual 4 and illicit account information, purportedly in the name of “Epic Music,” to make a fraudulent and unauthorized payment for a charter with Private Jet Company 2 from Chicago to Austin, Texas for WRIGHT (falsely listed as “Herbert Light”) and five other individuals. That day, these individuals

flew on the charter from Chicago to Austin.

g. On or about March 16, 2017, STRONG used the name of Individual 4 and illicit account information to make a fraudulent and unauthorized payment for a charter with Private Jet Company 2 from Chicago to Austin for Individual 6 and six other individuals. No passengers appeared for this flight.

The Commercial Airline and Retailer Frauds and the Stephenson County Jail Attempted Fraud

h. Co-conspirators used the same illicit account information to make the following fraudulent and unauthorized payments: (1) a payment at a commercial airline for tickets in the names of SORRELLS, Individual 1, and two others for a flight from Orlando, Florida, to Chicago on or about June 22, 2017; (2) a payment in the name of Individual 3 for a Massachusetts-based commercial retailer on or about June 29, 2017; and (3) an attempted payment at a government payment processing company to release an individual from the Stephenson County Jail, in Illinois, where that individual was then detained, on or about June 30, 2017.

i. On or about November 12, 2017, STRONG sent HAYES illicit account information over text message. HAYES then sent a screen shot of a commercial airline booking for a flight from Boston, Massachusetts to Atlanta, Georgia in the name of another individual. That day, a co-conspirator used that same account to make a fraudulent and unauthorized payment at the commercial airline for that individual to fly from Boston to Atlanta.

The Jamaican Villa Fraud

j. On or about June 12, 2017, WRIGHT contacted STRONG over Instagram to request a reservation for a private villa in Jamaica in July 2017.



k. On or about July 7, 2017, STRONG used the name of Individual 4 and illicit account information to make a fraudulent and unauthorized payment for a villa in Jamaica with Vacation Rental Company 1 for WRIGHT and his associates, who stayed at the property from July 7 to 11, 2017.

l. On or about July 9, 2017, WRIGHT sent STRONG a direct message over Instagram asking that STRONG provide Vacation Rental Company 1 with a payment card for incidental expenses because the front desk wanted to charge WRIGHT personally.

The Limousine Rental Company Limousine Fraud

m. On or about October 15, 2017, a co-conspirator used illicit account information to make a fraudulent and unauthorized payment for limousine services at Limousine Rental Company.

n. Also on or about October 15, 2017, STRONG sent HAYES the following text message, "Need u to save me Real quick Call this drive Im in . . . we need more hours An your other phone just died [.] If he ask yo name is Stanley Smith [.]"

o. HAYES responded, "Yea ion got no joints wats his . . . Line [?]"

p. STRONG replied, "Just tell him we need to club to club then Chicago after [.] He already got the joint he just need to authorize to charge more hours [.] So tell him [.] This the moves I used if he ask [.]" STRONG then sent a screen shot of illicit account information used to pay Limousine Rental Company.

q. HAYES wrote STRONG over text message, "I need id [.] Stanley smith . . . He wanna see it. . . . I just finessed him not to see card. . . . Told his ass I git big meetings n

shit.” STRONG then sent HAYES a photo of a Michigan driver’s license in the name of Stanley Smith. HAYES wrote back, “Card decline he say bro.”

The Private Jet Company 4 Fraud

r. On October 18, 2017, STRONG sent BENDER a text message containing illicit account information, as well as a message stating in pertinent part: “Please Have Them Take 4K From First Charge. ADD MY PERSONAL CARD FOR REMAINS ... Account x-0153 // EXP: [...] // Security Code on the back [...] // ZIP: [...].”

s. A co-conspirator using the names “Darren Geiger” and “Walter Calderon” provided Private Jet Company 4 illicit account information for a charter from Sacramento, California to Atlanta. After the card was declined, a co-conspirator sent Private Jet Company 4 an e-mail that stated in pertinent part: “Please Have Them Take 4K From First Charge. ADD MY PERSONAL CARD FOR REMAINS ... Account Darren Geiger ...x-0153 // EXP: [...]// Security Code on the back [...]// ZIP: [...]”;

t. STRONG sent a text message to WILLIAMS at Individual 2’s iCloud account containing a screenshot of illicit account information for five credit card accounts, along with the message “Order some pizza an stuff. I’ll be gone for a second.” The message included the x-0153 account that STRONG sent BENDER and which was provided to Private Jet Company 4 over e-mail; an account used to make two fraudulent and unauthorized payments for the Private Jet Company 4 flight; and an account used to make to make five fraudulent and unauthorized payments, including at a Chicago bar and restaurant.

The Hotel 1, Hotel 2, and Vacation Rental Company 1 Midtown Manhattan Villa Frauds

u. A co-conspirator used the same stolen credit card information to make the following fraudulent and unauthorized payments: (1) a payment for three hotel rooms at Vacation Rental Company 2 in BENDER's name from November 11 to 13, 2017, using the name "Darren Geiger"; (2) a payment for a room in the names of "Joseph Williaks" and JK at Hotel 1 on or about November 12, 2017; (3) a payment for a room in the names of "Joseph Williaks" and Individual 5 at Hotel 1 on or about November 13, 2017; and (4) a payment for four hotel rooms in the name of WILLIAMS at Hotel 2 from November 11 to 13, 2017, using the name "Darren Geiger."

v. On or about November 13, 2017, a co-conspirator used the names "Stan Smith" and "Darren Geiger," an account authorization form in the name of "Global Marketing, LLC," and illicit account information to book a villa in midtown Manhattan through Vacation Rental Company 1 for WILLIAMS, BENDER, Individual 5, and three others from November 13 to 17, 2017.

The Pet Company Fraud

w. On or about November 29, 2017, STRONG, using the name "Darren Geiger" and identifying himself as WRIGHT's manager, called Pet Company to order two designer puppies for WRIGHT to be charged on a stolen credit card.

x. Over text message, STRONG sent Pet Company a screenshot of a fraudulent Washington State driver's license in the name of "Darren Geiger" and refused Pet Company's request that STRONG take a photograph of himself holding the driver's license next

to his face.

y. Pet Company asked to speak with WRIGHT in person to confirm the order. HAYES called Pet Company and falsely identified himself as WRIGHT. Pet Company asked for a direct message confirmation from WRIGHT's own Instagram account. STRONG sent images of the dogs and receipt of payment for the dogs to WRIGHT over text message. STRONG then wrote WRIGHT over text message, "Check DM. Hurry just message that bitch hello."

z. WRIGHT messaged Pet Company "Hello" using Instagram. Pet Company responded, "You are getting 2 puppies correct?" WRIGHT confirmed.

aa. BENDER, providing the same illicit account information used to pay for the puppies, arranged for a car service to pick up the puppies by car from Pet Company and deliver them to Chicago.

bb. On or about December 3, 2017, BENDER used the same account information used in the Pet Company fraud to make a fraudulent and unauthorized payment for automobile insurance in his name.

SORRELLS's and HAYES's Messages to STRONG

cc. On December 2, 2017, STRONG asked SORRELLS to "[s]end . . . a move for a lyft" over text message. SORRELLS sent a screen shot of illicit account information. STRONG informed SORRELLS that the account did not work, and SORRELLS sent a screenshot containing details of additional illicit account information.

dd. On or about December 14, 2017, STRONG asked SORRELLS to "send me a move for 50 dollars." SORRELLS sent a screen shot containing illicit account information for



six credit card accounts.

ee. Also on or about December 14, 2017, STRONG asked HAYES for a “move.” HAYES sent a screen shot containing illicit account information for six credit card accounts.

The Attempted Private Jet Company 3 Fraud

ff. On or about December 27, 2017, HAYES sent STRONG a text message containing a screenshot of illicit account information. STRONG then used the name “Stan Smith” and that account information to book a flight with Private Jet Company 3 from Chicago to Van Nuys, California on December 28, 2017.

gg. On or about December 28, 2017, STRONG sent HAYES a text message containing a screen shot of an e-mail referencing the Private Jet Company 3 “trip sheet for today’s flight.” Later, STRONG sent HAYES a text message stating, “Here I come.”

hh. On or about December 28, 2017, STRONG sent SORRELLS a text message containing the Private Jet Company 3 itinerary with the message “Wea YAL at.”

ii. On or about December 28, 2017, STRONG, SORRELLS, HAYES, Individual 1, and Individual 5, among others, arrived at a private jet terminal in Chicago to attempt to board the flight. STRONG, SORRELLS, and Individual 5 fled the scene when they saw law enforcement at the terminal.

COUNT ONE  
Conspiracy to Commit Wire Fraud  
(18 U.S.C. § 1349)

The Grand Jury charges:

22. The Grand Jury re-alleges and incorporates by reference paragraphs 1 through 21, including all subparagraphs, of this Indictment.

23. From at least March 2016 through present, in the District of Massachusetts and elsewhere, the defendants,

- (1) ANTONIO STRONG, also known as “T-Glo,” “Tony Glo,” “Tonio,” “Antonio Strom,” “Michael Starkman,” “Richard O’Malley,” “Michael Lee,” “Mark Daniels,” “Sergio Parker,” “Michael Leary,” “Charles Gaut,” “Darren Geiger,” “Stan Smith,” and “Tyson Kocher,”
- (2) HERBERT WRIGHT III, also known as “Herb,” “Lil Herb,” “G Herbo,” and “Herbert Light,”
- (3) JOSEPH WILLIAMS, also known as “Joe Rodeo,” “Rockstar Rodie,” and “Rodie,”
- (4) STEVEN HAYES, JR.,
- (5) DEMARIO SORRELLS, also known as “Jonte,” and “Johntay,” and
- (6) TERRENCE BENDER, also known as “Blends” and “Dopeblends,”

conspired with each other and with others known and unknown to the Grand Jury to commit wire fraud, that is, having devised and intending to devise a scheme and artifice to defraud, and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, did transmit and cause to be transmitted, by means of wire communications in interstate

and foreign commerce, writings, signs, signals, pictures and sounds, for the purpose of executing the scheme to defraud, in violation of Title 18, United States Code, Section 1343.

All in violation of Title 18, United States Code, Section 1349.

COUNTS TWO THROUGH FIVEWire Fraud  
(18 U.S.C. § 1343)

24. The Grand Jury re-alleges and incorporates by reference Paragraphs 1 through 21, including all subparagraphs, of this Indictment.

25. On or about the dates set forth below, in the District of Massachusetts, and elsewhere, the defendant,

(1) ANTONIO STRONG, also known as “T-Glo,” “Tony Glo,” “Tonio,” “Antonio Strom,” “Michael Starkman,” “Richard O’Malley,” “Michael Lee,” “Mark Daniels,” “Sergio Parker,” “Michael Leary,” “Charles Gaut,” “Darren Geiger,” “Stan Smith,” and “Tyson Kocher,”

having devised and intending to devise a scheme and artifice to defraud, and for obtaining money and property by means of materially false and fraudulent pretenses, representations, and promises, did transmit and cause to be transmitted by means of wire communications in interstate and foreign commerce, writings, signs, signals, pictures, and sounds for the purpose of executing the scheme to defraud, as set forth below:

Count	Date	Description of
2	3-14-17	E-mail from <a href="mailto:Globalsociety2017@gmail.com">Globalsociety2017@gmail.com</a> to WW of Private Jet Company 2, through servers located within the District of Massachusetts, containing account information for the stolen credit card x-6764 for the flight boarded by STRONG from Miami, Florida to Chicago, Illinois
3	3-15-17	E-mail from <a href="mailto:Globalsociety2017@gmail.com">Globalsociety2017@gmail.com</a> to WW of Private Jet Company 2, through servers located within the District of Massachusetts, containing account information for the stolen credit card x-4332 for the flight boarded by STRONG from Miami, Florida to Chicago, Illinois



Count	Date	Description of
4	3-16-17	E-mail from <u>Globalsociety2017@gmail.com</u> to WW of Private Jet Company 2, through servers located within the District of Massachusetts, containing account information for the stolen credit card x-8938 in the name of PS for the flight from Chicago, Illinois to Austin, Texas
5	7-7-17	E-mail from <u>D.Williamsonla@gmail.com</u> to LB of Vacation Rental Company 1 containing a guest list for a trip to a Jamaican villa through servers located within the District of Massachusetts

All in violation of Title 18, United States Code, Sections 1343 and 2.

COUNTS SIX THROUGH FOURTEEN

Aggravated Identity Theft; Aiding and Abetting  
(18 U.S.C. § 1028A(a)(1) and 2)

26. The Grand Jury re-alleges and incorporates by reference paragraphs 1 to 21, including all subparagraphs, of this Indictment.

27. On or about the following dates, in the District of Massachusetts, and elsewhere, the defendants,

- (1) ANTONIO STRONG, also known as “T-Glo,” “Tony Glo,” “Tonio,” “Antonio Strom,” “Michael Starkman,” “Richard O’Malley,” “Michael Lee,” “Mark Daniels,” “Sergio Parker,” “Michael Leary,” “Charles Gaut,” “Darren Geiger,” “Stan Smith,” and “Tyson Kocher,”
- (2) HERBERT WRIGHT, also known as “Herb,” “Lil Herb,” “G Herbo,” and “Herbert Light,”
- (3) JOSEPH WILLIAMS, also known as “Joe Rodeo,” “Rockstar Rodie,” and “Rodie,”
- (4) STEVEN HAYES, JR.,
- (5) DEMARIO SORRELLS, also known as “Jonte,” and “Johntay,” and
- (6) TERRENCE BENDER, also known as “Blends” and “Dopeblends,”

did knowingly transfer, possesses, and use, without lawful authority, a means of identification of another person during and in relation to a felony violation enumerated in 18 U.S.C. § 1028A(c), that is:

Count	Defendant(s)	Date	Means of Identification	Felony Violation
6	STRONG	3-14-17	Payment card account number x-6764 in the name of WP that belonged to WP	18 U.S.C. § 1349, as set forth in COUNT 1; and 18 U.S.C. § 1343, as set forth in COUNT 2
7	STRONG	3-15-17	Payment card account number x-4332 in the name of KS that belonged to KS	18 U.S.C. § 1349, as set forth in COUNT 1; and 18 U.S.C. § 1343, as set forth in COUNT 3
8	STRONG and WRIGHT	3-16-17	Payment card account number x-8938 in the name of PS that belonged to PS	18 U.S.C. § 1349, as set forth in COUNT 1; and 18 U.S.C. § 1343, as set forth in COUNT 4
9	STRONG	3-16-17	Payment card account number x-1252 in the name of DB that belonged to DB	18 U.S.C. § 1349, as set forth in COUNT 1
10	STRONG	7-7-17	Payment card account number x-3774 in the name of RW that belonged to RW	18 U.S.C. § 1349, as set forth in COUNT 1
11	STRONG, SORRELLS, and WILLIAMS	3-6-17	Payment card account number x-7320 in the name of JL that belonged to JL	18 U.S.C. § 1349, as set forth in COUNT 1
12	STRONG, WRIGHT, HAYES, and BENDER	11-29-17	Payment card account number x-5433 in the name of DB that belonged to DB	18 U.S.C. § 1349, as set forth in COUNT 1
13	STRONG, WILLIAMS, and BENDER	10-18-17	Payment card account number x-0153 in the name of NC that belonged to NC and number x-5032 of MG that belonged to MG	18 U.S.C. § 1349, as set forth in COUNT 1
14	STRONG and HAYES	11-12-17	Payment card account number x-6012 in the name of CM that belonged to CM	18 U.S.C. § 1349, as set forth in COUNT 1

All in violation of Title 18, United States Code, Sections 1028A(a)(1) and 2.

FORFEITURE ALLEGATION

(18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c))

1. Upon conviction of one or more of the offenses in violation of Title 18, United States Code, Sections 1349 and 1343, set forth in Counts Two through Five, the defendants,

- (1) ANTONIO STRONG, also known as “T-Glo,” “Tony Glo,” “Tonio,” “Antonio Strom,” “Michael Starkman,” “Richard O’Malley,” “Michael Lee,” “Mark Daniels,” “Sergio Parker,” “Michael Leary,” “Charles Gaut,” “Darren Geiger,” “Stan Smith,” and “Tyson Kocher,”
- (2) HERBERT WRIGHT III, also known as “Herb,” “Lil Herb,” “G Herbo,” and “Herbert Light,”
- (3) JOSEPH WILLIAMS, also known as “Joe Rodeo,” “Rockstar Rodie,” and “Rodie,” and
- (4) STEVEN HAYES, JR.,
- (5) DEMARIO SORRELLS, also known as “Jonte,” and “Johntay,” and
- (6) TERRENCE BENDER, also known as “Blends” and “Dopeblends,”

shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the offenses.

2. If any of the property described in Paragraph 1, above, as being forfeitable pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c), as a result of any act or omission of the defendants --

- a. cannot be located upon the exercise of due diligence;



- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intention of the United States, pursuant to Title 28, United States Code, Section 2461(c), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendants up to the value of the property described in Paragraph 1 above.

All pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c).

A TRUE BILL



FOREPERSON

A handwritten signature in blue ink, appearing to read "H. H. Breslow".

STEVEN H. BRESLOW  
ASSISTANT UNITED STATES ATTORNEY  
UNITED STATES ATTORNEY'S OFFICE  
DISTRICT OF MASSACHUSETTS

A handwritten signature in blue ink, appearing to read "Michelle Pascucci".

MICHELLE PASCUCCI  
TRIAL ATTORNEY  
FRAUD SECTION, CRIMINAL DIVISION  
UNITED STATES DEPARTMENT OF JUSTICE

District of Massachusetts: October 15, 2020 at 4:52 p.m.  
Returned into the District Court by the Grand Jurors and filed.

Melissa M. Rivera  
DEPUTY CLERK